



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

June 19, 2003

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Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant

RE: **Eaton Corporation 141-17369-00057**

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

FNPERAM.wpd 8/21/02

June 19, 2003

Mr. James Seaver  
Eaton Corporation/Forge Division  
2930 Foundation Drive  
South Bend, IN 46628

Re: **141-17369-00057**  
First Administrative Amendment to  
**FESOP 141-13952-00057**

Dear Mr. Seaver:

Eaton Corporation/Forge Division was issued a permit on February 19, 2002 for a stationary metal product forging and fabricating operation. A letter requesting a change was received on March 17, 2003. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

Eaton Corporation has submitted a request to add three (3) Nishijimax NHC100 CNC cutoff saws.

The proposed equipment will not increase the capacity or emissions of any existing emission units. Therefore, the emissions due to the proposed modification are the PM and PM10 emissions from the proposed saws.

The PM and PM10 UPTe from the proposed cutoff saws are estimated to be 0.90 and 0.90 tons per year, respectively, which are less than the 326 IAC 2-8-11.1(d)(4)(A) low end applicable levels of 5 and 5 tons per year.

In addition, adding the proposed equipment does not trigger any new applicable requirements nor will there be any changes to any existing permit conditions that are required.

Therefore, the proposed cutoff saws shall be incorporated into the existing source FESOP via an Administrative Amendment pursuant to 326 IAC 2-8-10(a)(6) which states that any changes which revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term, may be incorporated into the existing source FESOP via an Administrative Amendment.

To incorporate the proposed modification into the permit, the following changes shall be made. All added information is indicated in bold type. All deleted information is struck-out.

**(a) Condition A.3:**

Condition A.3 shall be amended as follows to include the proposed cutoff saws.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. There are no boilers at this source.

.....

- (l) One (1) plastic blast system, identified as EU-10, constructed in 1994, controlled by a baghouse and Hepa filter, and exhausting to stack SV-6: [326 IAC 6-1], **and**
- (m) **Three (3) Nishijimax NHC100 CNC billet cutoff saws.**

**(b) Unit Description of Section D.3:**

The unit description of Section D.3 shall be amended as follows to include the proposed cutoff saws.

**SECTION D.3 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities**

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. There are no boilers at this source.

.....

- (l) One (1) plastic blast system, identified as EU-10, constructed in 1994, controlled by a baghouse and Hepa filter, and exhausting to stack SV-6: [326 IAC 6-1], **and**
- (m) **Three (3) Nishijimax NHC100 CNC billet cutoff saws.**

**(c) Condition D.3.1:**

Condition D.3.1 shall be amended as follows to include the proposed billet cutoff saws.

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the:

- (a) ~~insignificant brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining and plastic blast system at this source~~ **exhausting through Stack SV-7,**
- (b) **equipment exhausting through Stack SV-8, and**
- (c) **three (3) Nishijimax NHC100 CNC billet cutoff saws,**

**each**, shall be limited to 0.03 grain per dry standard cubic foot, ~~equivalent to 0.309 pounds per hour from the equipment exhausting through stack SV-7, when operating at a flow rate of 1,200 actual cubic feet per minute, and 0.540 pounds per hour from the equipment exhausting through stack SV-8, when operating at a flow rate of 2,100 actual cubic feet per minute.~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

SDF

cc: File - St. Joseph County  
U.S. EPA, Region V  
St. Joseph County Health Department  
Northern Regional Office  
St. Joseph County Local Agency  
Air Compliance Section Inspector - Rick Reynolds  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP) RENEWAL  
OFFICE OF AIR QUALITY**

**Eaton Corporation  
2930 Foundation Drive  
South Bend, Indiana 46628**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 141-13952-00057	Date Issued February 19, 2002
First Administrative Amendment No.: 141-17369-00057	Affected Pages: 7, 33, 34, and 35
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issued: June 19, 2003

- (19) Bridgeport mill vertical 9 X 42 mill
  - (20) Engin lathe
  - (21) Enterprise horizontal mill
  - (22) Giddings 10TF CNC lathe
  - (23) Giddings 15TF CNC
  - (24) Marvel horizontal saw
  - (25) Madison grinder
  - (26) OKK mill
  - (27) Bridgeport vertical mill
  - (28) Four (4) drill presses
  - (29) Arbor press
  - (30) Johansson drill press
  - (31) Clausing 15" lathe
  - (32) Clausing band saw
  - (33) Kondia power mill
  - (34) Monarch 18" CNC lathe
  - (35) Cinn 273A grinder
  - (36) Heem 18" vertical saw
  - (37) Dewalt 12" radial saw
  - (38) Wadtkin 12" table saw
  - (39) Empire sand blast cabinet
  - (40) 3012U band saw
  - (41) 16" Boring mill
  - (42) Mazak CNC milling machine
  - (43) Okuma CNC Lathe LB35II
  - (44) Okuma CNC Lath L1420
  - (45) Mitsubishi DWC90HA wire EDM
  - (46) Dake movable bed arbor machine
- 
- (h) Welders for maintenance - have manganese compounds in rod. Small amount of spray cans are used to mark containers for maintenance (Rustoleum) which contains toluene and xylene. [326 IAC 6-1]
  - (i) Oil recovery system.
  - (j) Two (2) electric Tool room heat treat cabinets
  - (k) Water evaporator
  - (l) One (1) plastic blast system, identified as EU-10, constructed in 1994, controlled by a baghouse and Hepa filter, and exhausting to stack SV-6 [326 IAC 6-1], and
  - (m) Three (3) Nishijimax NHC100 CNC billet cutoff saws.

- (25) Madison grinder
- (26) OKK mill
- (27) Bridgeport vertical mill
- (28) Four (4) drill presses
- (29) Arbor press
- (30) Johansson drill press
- (31) Clausing 15" lathe
- (32) Clausing band saw
- (33) Kondia power mill
- (34) Monarch 18" CNC lathe
- (35) Cinn 273A grinder
- (36) Heem 18" vertical saw
- (37) Dewalt 12" radial saw
- (38) Wadtkin 12" table saw
- (39) Empire sand blast cabinet
- (40) 3012U band saw
- (41) 16" Boring mill
- (42) Mazak CNC milling machine
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- (44) Okuma CNC Lath L1420
- (45) Mitsubishi DWC90HA wire EDM
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- (h) Welders for maintenance - have manganese compounds in rod. Small amount of spray cans are used to mark containers for maintenance (Rustoleum) which contains toluene and xylene. [326 IAC 6-1]
- (i) Oil recovery system.
- (j) Two (2) electric Tool room heat treat cabinets
- (k) Water evaporator
- (l) One (1) plastic blast system, identified as EU-10, constructed in 1994, controlled by a baghouse and Hepa filter, and exhausting to stack SV-6 [326 IAC 6-1], and
- (m) Three (3) Nishijimax NHC100 CNC billet cutoff saws.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

##### **D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]**

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the:

- (a) equipment exhausting through Stack SV-7,
- (b) equipment exhausting through Stack SV-8, and

(c) three (3) Nishijimax NHC100 CNC billet cutoff saws,

each, shall be limited to 0.03 grain per dry standard cubic foot.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs, in St. Joseph County, shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility without remote solvent reservoirs, in St. Joseph County, shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### **Compliance Determination Requirements**

#### **D.3.3 Particulate Matter (PM and PM<sub>10</sub>)**

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In order to comply with Condition D.3.1, the control devices for PM and PM<sub>10</sub> control shall be in operation at all times when the insignificant grinding and machining and plastic blast system are in operation.

Indiana Department of Environmental Management  
Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to a  
Federally Enforceable State Operating Permit (FESOP)

**Source Background and Description**

Source Name:	Eaton Corporation
Source Location:	2930 Foundation Drive, South Bend, Indiana 46628
County:	St. Joseph
SIC Code:	3462
Operation Permit No.:	141-13952-00057
Date Issued:	February 19, 2002
1 <sup>st</sup> Administrative Amendment No.:	141-17369-00057
Permit Reviewer:	SDF

**Request**

The Office of Air Quality (OAQ) has reviewed an application from Eaton Corporation relating to the operation of their metal product forging and fabricating source.

Eaton Corporation has submitted a request to add three (3) Nishijimax NHC100 CNC cutoff saws.

The proposed equipment will not increase the capacity or emissions of any existing emission units. Therefore, the emissions due to the proposed modification are the PM and PM10 emissions from the proposed saws.

The PM and PM10 UPTD from the proposed cutoff saws are estimated to be 0.90 and 0.90 tons per year, respectively, which are less than the 326 IAC 2-8-11.1(d)(4)(A) low end applicable levels of 5 and 5 tons per year.

In addition, adding the proposed equipment does not trigger any new applicable requirements nor will there be any changes to any existing permit conditions that are required.

Therefore, the proposed cutoff saws shall be incorporated into the existing source FESOP via an Administrative Amendment pursuant to 326 IAC 2-8-10(a)(6) which states that any changes which revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term, may be incorporated into the existing source FESOP via an Administrative Amendment.

**Existing Approvals**

The source has been operating under FESOP renewal 141-13952-00057, issued on February 19, 2002.

**Recommendation**

The staff recommends to the Commissioner that the Administrative Amendment be approved. This recommendation is based on information derived from the application and additional information received on June 4, 2003.

## Emission Calculations

The emissions due to the proposed modification are the proposed cutoff saw PM and PM10 emissions. The following calculations determine the unrestricted potential to emit (UPTE) and emissions after controls from these units.

### 1. Unrestricted Potential to Emit (UPTE) Due to the Modification:

The following calculations determine the PM and PM10 UPTE from the proposed cutoff saws based on a maximum source test emission rate of 0.2059 pounds per hour, emissions before controls, and 8760 hours of operation.

$$0.2059 \text{ lb PM/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton PM/lb PM} = 0.90 \text{ tons PM/yr}$$

PM10 is determined to be equal to PM in this case.

### 2. Emissions After Controls:

The cutoff saw emissions are uncontrolled.

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.90
PM-10	0.90
SO <sub>2</sub>	-
VOC	-
CO	-
NO <sub>x</sub>	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Pollutant	Potential To Emit (tons/year)
Worst Case Single HAP	-
Combined HAP	-

The PM and PM10 UPTE from the proposed cutoff saws are estimated to be 0.90 and 0.90 tons per year, respectively which are less than the 326 IAC 2-8-11.1(d)(4)(A) low end applicable levels of 5 and 5 tons per year.

In addition, adding the proposed equipment does not trigger any new applicable requirements nor will there be any changes to any existing permit conditions that are required.

Therefore, the proposed cutoff saws shall be incorporated into the existing source FESOP via an Administrative Amendment pursuant to 326 IAC 2-8-10(a)(6) which states that any changes which revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term, may be incorporated into the existing source FESOP via an Administrative Amendment.

### County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) St. Joseph County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Existing Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited), as obtained from the Technical Support Document of FESOP 141-13952-00057, issued on February 19, 2002:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
EU-8 and EU-9	192.00	95.90	-	-	-	-	-	-
EU-1-EU6, EU-13, EU-14	2.68	0.02	-	-	-	-	-	-
Insignificant Activities	3.00	3.00	1.00	15.00	5.00	10.00	<10	1.00
<b>Total</b>	<b>197.68</b>	<b>98.92</b>	<b>1.00</b>	<b>15.00</b>	<b>5.00</b>	<b>10.00</b>	<b>&lt;10</b>	<b>1.00</b>

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The combined PM emissions from shot blasters EU-8 and EU-9 are limited to 43.8 lb/hr (192 tons/yr) and the combined PM emissions from forge press cells EU-1 through EU-6, EU-13, and EU-14 are limited to 0.613 lb/hr (2.68 tons/yr) which, combined with the other existing limitations and standards and emissions from the other existing PM generating units, limit the source PM emissions to 197.68 tons/yr.
- (b) The combined PM10 emissions from shot blasters EU-8 and EU-9 are limited to 21.98 lb/hr (95.90 tons/yr) and the combined PM10 emissions from forge press cells EU-1 through EU-6, EU-13, and EU-14 are limited to 0.005 lb/hr (0.02 tons/yr) which, combined with the other existing limitations and standards and emissions from the other existing PM10 generating units, limit the source PM10 emissions to 98.92 tons/yr.
- (c) The existing source is not a major PSD stationary source because no regulated pollutant emissions are greater than their respective major source levels and the source is not one of the 28 listed source categories.
- (d) The existing source is not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

#### Source Emissions After the Modification

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
EU-8 and EU-9	192.00	95.90	-	-	-	-	-	-
EU-1-EU6, EU-13, EU-14	2.68	0.02	-	-	-	-	-	-
Existing Insignificant Activities	3.00	3.00	1.00	15.00	5.00	10.00	<10	1.00
Proposed Equipment	0.90	0.90	-	-	-	-	-	-
<b>Total</b>	<b>198.58</b>	<b>99.82</b>	<b>1.00</b>	<b>15.00</b>	<b>5.00</b>	<b>10.00</b>	<b>&lt;10</b>	<b>1.00</b>

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The combined PM emissions from shot blasters EU-8 and EU-9 are still limited to 192 tons/yr and the combined PM emissions from forge press cells EU-1 through EU-6, EU-13, and EU-14 are still limited to 2.68 tons/yr which, combined with the other existing limitations and standards and emissions from the other PM generating units, including the proposed equipment emissions, limit the source PM emissions to 198.58 tons/yr.
- (b) The combined PM10 emissions from shot blasters EU-8 and EU-9 are still limited to 95.90 tons/yr and the combined PM emissions from forge press cells EU-1 through EU-6, EU-13, and EU-14 are still limited to 0.02 tons/yr which, combined with the other existing limitations and standards and emissions from the other PM10 generating units, including the proposed equipment emissions, limit the source PM10 emissions to 99.82 tons/yr.
- (c) The source after the proposed modification is still not a major PSD stationary source because no regulated pollutant emissions are greater than their respective major source levels and the source is not one of the 28 listed source categories.
- (d) The source after the proposed modification is still not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

#### **Federal Rule Applicability**

##### **(a) New Source Performance Standards (NSPS):**

There are still no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

The proposed equipment will not affect the existing source status and there are no new NSPS that apply to the proposed equipment.

##### **(b) National Emissions Standards for Hazardous Air Pollutants (NESHAPS):**

There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

The requirements of 40 CFR Part 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning, still do not apply to the existing parts washers because no halogenated solvents are used and there are no new NESHAPs that apply to the proposed equipment.

#### **State Rule Applicability - Entire Source**

##### **(a) 326 IAC 1-7 (Stack Height):**

The stack height requirements under 326 IAC 1-7 still apply. The proposed equipment will not affect the status of these requirements.

**(b) 326 IAC 2-2 (Prevention of Significant Deterioration):**

The combined PM emissions from shot blasters EU-8 and EU-9 are limited to 192 tons/yr and the combined PM emissions from forge press cells EU-1 through EU-6, EU-13, and EU-14 are limited to 2.68 tons/yr which, combined with the other existing limitations and standards and emissions from the other PM generating units, including the emissions from the proposed equipment, limit the source PM emissions to 198.58 tons/yr.

After implementation of these limitations, no criteria pollutant emissions exceed their respective applicable major source level of 250 tons per year.

Therefore, the PSD requirements under 326 IAC 2-2 do not apply.

**(c) 326 IAC 2-6 (Emission Reporting):**

This source is still subject to requirements of 326 IAC 2-6 because the source NO<sub>x</sub> emissions still exceed the St. Joseph County applicable level of 10 tons per year.

**(d) 326 IAC 2-8-4 (FESOP):**

The combined PM<sub>10</sub> emissions from shot blasters EU-8 and EU-9 are limited to 95.90 tons/yr and the combined PM emissions from forge press cells EU-1 through EU-6, EU-13, and EU-14 are limited to 0.02 tons/yr which, combined with the other existing limitations and standards and emissions from the other PM<sub>10</sub> generating units, including the emissions from the proposed equipment, limit the source PM<sub>10</sub> emissions to 99.82 tons/yr.

After implementation of these limitations, no criteria pollutant emissions exceed their respective applicable major source level of 100 tons per year, the worst case single HAP emissions are less than the applicable level of 10 tons per year, and the combined HAP emissions are less than the applicable level of 25 tons per year.

Therefore, the Part 70 requirements under 326 IAC 2-7 do not apply.

**(e) 326 IAC 2-8-4(9) (Preventive Maintenance Plan):**

The existing source preventive maintenance plan requirements under 326 IAC 2-8-4(9) still apply. The proposed equipment will not affect the status of these requirements.

**(f) 326 IAC 4-1 (Open Burning):**

The open burning requirements under 326 IAC 4-1 still apply. The proposed equipment will not affect the status of these requirements.

**(g) 326 IAC 4-2 (incineration):**

The incineration requirements under 326 IAC 4-2 still apply. The proposed equipment will not affect the status of these requirements.

**(h) 326 IAC 5-1 (Visible Opacity Limitations):**

The opacity requirements under 326 IAC 5-1 still apply. The proposed equipment will not affect the status of these requirements.

**(i) 326 IAC 6-4 (Fugitive Dust):**

The fugitive dust requirements under 326 IAC 6-4 still apply. The proposed equipment will not affect the status of these requirements.

**State Rule Applicability - Individual Facilities**

**326 IAC 6-1 (Particulate Matter):**

Pursuant to 326 IAC 6-1, sources or facilities that are located St. Joseph County, are not specifically listed in 326 IAC 6-1-7, and have potential to emit or actual PM emissions greater than or equal to 100 and 10 tons per year, respectively, shall comply with the limitations specified in 326 IAC 6-1-2.

The source is located in St. Joseph County, is not one of the listed sources, and the source PM potential to emit is greater than 100 tons per year. Therefore, the owner or operator shall comply with the requirements specified in 326 IAC 6-1-2.

Pursuant to 326 IAC 6-1-2(a), facilities that are not steam generators, asphalt concrete plant facilities, grain elevator facilities, foundry facilities, glass container manufacturing facilities, or mineral aggregate operation facilities, shall limit the PM emissions to 0.03 gr/dscf or less.

Since the proposed saws are not any of the listed specific affected facilities listed in 326 IAC 6-1-2(a), the proposed saws shall be limited to 0.03 gr/dscf.

**Changes to the Permit**

To incorporate the proposed modification into the permit, the following changes shall be made. All added information is indicated in bold type. All deleted information is struck-out.

**(a) Condition A.3:**

Condition A.3 shall be amended as follows to include the proposed cutoff saws.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. There are no boilers at this source.

.....

- (l) One (1) plastic blast system, identified as EU-10, constructed in 1994, controlled by a baghouse and Hepa filter, and exhausting to stack SV-6- [326 IAC 6-1], **and**

- (m) **Three (3) Nishijimax NHC100 CNC billet cutoff saws.**

**(b) Unit Description of Section D.3:**

The unit description of Section D.3 shall be amended as follows to include the proposed cutoff saws.

### SECTION D.3 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. There are no boilers at this source.

.....

(l) One (1) plastic blast system, identified as EU-10, constructed in 1994, controlled by a baghouse and Hepa filter, and exhausting to stack SV-6- [326 IAC 6-1], **and**

**(m) Three (3) Nishijimax NHC100 CNC billet cutoff saws.**

#### (c) Condition D.3.1:

Condition D.3.1 shall be amended as follows to include the proposed billet cutoff saws.

##### D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the:

(a) ~~insignificant brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining and plastic blast system at this source~~ **exhausting through Stack SV-7,**

(b) **equipment exhausting through Stack SV-8, and**

(c) **three (3) Nishijimax NHC100 CNC billet cutoff saws,**

**each, shall be limited to 0.03 grain per dry standard cubic foot, ~~equivalent to 0.309 pounds per hour from the equipment exhausting through stack SV-7, when operating at a flow rate of 1,200 actual cubic feet per minute, and 0.540 pounds per hour from the equipment exhausting through stack SV-8, when operating at a flow rate of 2,100 actual cubic feet per minute.~~**

#### Conclusion

The proposed cutoff saws shall be constructed and operated according to the provisions existing source FESOP 141-13952-00057 and proposed Administrative Amendment 141-17369-00057.